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*Attorneys for individual and representative
Plaintiffs Shonetta Crain and Kira Serna*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHONETTA CRAIN AND KIRA SERNA,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ACCREDITED CASUALTY AND SURETY
COMPANY, INC., et al.,

Defendants.

Case No. 3:19-CV-001265-JST

CLASS ACTION

**DECLARATION OF LAURA L. HO IN
SUPPORT OF PLAINTIFFS' JOINT
MOTION FOR APPOINTMENT OF
INTERIM CLASS COUNSEL**

Date: June 6, 2019

Time: 2:00p.m.

Location: Courtroom 9

Judge: The Honorable Jon S. Tigar

STEVEN BREAUX, individually and on
behalf of all other similar situated individuals,

Plaintiff,

v.

ACCREDITED CASUALTY AND SURETY
COMPANY, INC., et al.,

Defendants.

Case No. 3:19-CV-00717-JST

1 I, Laura L. Ho, declare as follows:

2 1. I am a member in good standing of the Bar of the State of California and a shareholder
3 at the law firm of Goldstein, Borgen, Dardarian & Ho ("GBDH"), in Oakland, California. I am
4 counsel for Plaintiffs and the proposed class in this action along with Hammond Law, PC. I have
5 personal knowledge of the facts set forth in this declaration and could and would testify competently to
6 them if called upon to do so.

7 2. I submit this declaration in support of Plaintiff's' Motion for Appointment of Interim
8 Class Counsel.

9 3. Goldstein, Borgen, Dardarian & Ho ("GBDH") is a plaintiffs' complex and class action
10 firm that was founded in 1972, in Oakland, California. GBDH has a national practice. We have
11 litigated class actions over the last forty plus years in Arizona, Florida, Georgia, Illinois, Iowa,
12 Missouri, Minnesota, Maryland, Nebraska, New Jersey, New York, Pennsylvania, Tennessee, and
13 Texas, as well as California. GBDH has successfully prosecuted scores of class, collective, and
14 complex actions in state and federal courts nationally, in the areas of consumer rights, wage and hour,
15 voting rights, employment discrimination, disability access, public accommodations, and
16 environmental justice. A copy of the firm's resume is attached as Exhibit A.

17 4. I have been with GBDH since October 1998, became a partner in January 2005, and a
18 named partner in 2014. A copy of my resume is attached as Exhibit B. During my time at GBDH, I
19 have been responsible for all facets of class action and other complex litigation, from pre-filing
20 investigation through trial and appeal. The class and collective actions I have litigated throughout the
21 past twenty years have led to favorable class action settlements that have recouped millions of dollars
22 on behalf of plaintiffs, including *Siciliano v. Apple, Inc.*, Case No. 13-cv-257676 (Santa Clara Cnty.
23 Super. Ct.) (approving \$16 million class action settlement for Apple in-app subscribers in California);
24 *In Re Uber FCRA Litigation*, No. 3:14-cv-05200-EMC (N.D. Cal. May 11, 2018) (approving \$7.5
25 million class action settlement for drivers denied employment or terminated after background checks);
26 *Willey v. Techtronic Indus. N. Am.*, No. RG 16806307 (Alameda Cnty. Super. Ct. Aug. 4, 2017) (\$3.5
27 million class settlement on behalf of sales representatives); *Talamantes v. PPG Industries, Inc.*, No.
28

1 C13-04602-WHO (N.D. Cal.) (class and collective action settlement of \$5 million for just over 100
2 class members approved in 2015); *Willner v. Manpower*, No. 11-cv-02846-JST (N.D. Cal.) (class
3 action settlement for \$8.75 million on behalf of over 20,000 temporary employees in California
4 alleging deficient wage statements); *Morazan v. Aramark Uniform & Career Apparel Group*, No. 13-
5 CV-00936 (YGR) (N.D. Cal.) (\$2,750,000 class settlement approved in 2013); *Garcia v. Oracle*, JCCP
6 No. 004597 (Alameda Cnty. Super. Ct.) (\$35 million class settlement approved in 2012); *Galu v.*
7 *Genentech*, No. 505266 (San Mateo Cnty. Super. Ct.) (lead counsel in \$2.1 million settlement for 111
8 Foundation Specialists); *Myart v. Autozone*, No. 05CC03219 (Orange Cnty. Super Ct.) (final approval
9 in September 2011 of \$9 million settlement on behalf of hourly workers statewide); *Contreras v. Bank*
10 *of America*, No. CGC-07-467749 (S.F. Superior Court) (co-lead counsel in \$16.65 million settlement
11 for 3,000 mortgage loan officers in California approved in 2010); *Meyn v. Peet's Coffee & Tea, Inc.*,
12 No. RG08398070 (Alameda Cnty. Super. Ct.) (final approval in 2010 of \$2.6 million settlement for
13 over 400 store managers); *Mousai v. E-Loan, Inc.*, No. 06-01993 SI (N.D. Cal.) (\$13.6 million
14 settlement in overtime class action for mortgage salespeople approved in May 2007); *Lin v. Siebel*
15 *Systems, Inc.*, No. CIV 435601 (San Mateo Cnty. Super. Ct.) (final approval in 2007 for \$27.5 million
16 class action settlement in overtime case for certified class of over 800 software engineers); *Butler v.*
17 *Countrywide*, No. BC 268250 (L.A. Cnty. Super. Ct.) (\$30 million class settlement for over 450
18 misclassified account executives approved in 2005).

19 5. My partner, Andrew P. Lee, is also working on this case. He is a class action litigator,
20 with approximately thirteen years of experience. He joined GBDH in 2013 and became a partner in
21 January 2015. During his time at GBDH, Mr. Lee has been responsible for all facets of employment,
22 disability, and consumer class actions and other complex litigation, from pre-filing investigation,
23 discovery, and motion practice through class certification, trial, appeal, and/or settlement approval. In
24 2015, Super Lawyers selected Mr. Lee as a Northern California "Rising Star" from 2015-17. Among
25 the cases he has had a substantial leading role or had heavy involvement were *Willits v. City of Los*
26 *Angeles*, No. 10-cv-05782 CBM (RZx) (C.D. Cal.) (\$1.37 billion injunctive relief class action on
27 behalf of a class of persons with mobility disabilities who reside in the City of Los Angeles); *Ochoa v.*
28

1 *City of Long Beach*, No. 14-cv-04307-DSF (FFMx) (C.D. Cal.) (\$200 million injunctive relief class
2 action on behalf of a class of persons with mobility disabilities who reside in the City of Long Beach);
3 *Reynoldson v. City of Seattle*, No. 15-cv-01608 (W.D. Wash) (\$300 million injunctive relief class
4 action on behalf of a class of persons with mobility disabilities who reside in the City of Seattle); *Wren*
5 *v. RGIS Inventory Specialists, LLC*, Case No. C-06-05778 (N.D. Cal.) (\$27 million nation-wide
6 collective action and multi-state class action for unpaid wages); *Chau et al. v. CVS RX Services, Inc.*,
7 Case No. BC349224 (Los Angeles Superior Court) (\$19.75 million class action for unpaid wages);
8 *Lopes v. Kohl's Department Stores*, Case No. RG08380189 (Alameda County Superior Court)
9 (certified wage and hour class action involving approximately 122,000 class members); *Williams v.*
10 *H&R Block Enterprises, Inc.*, Case No. RG08366506 (Alameda County Superior Court) (\$7.5 million
11 class action for unpaid wages).

12 I declare under penalty of perjury under the laws of the State of California and the United
13 States that the foregoing is true and correct. Executed May 1, 2019, in Oakland, CA.

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15 /s/ Laura L. Ho
16 Laura L. Ho
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